

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2024 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAVID RODRIGUEZ,  
aka "Gotti,"  
aka "Fat Boy," and  
RAYMOND O'CONNELL,  
aka "Sal,"  
aka "White Boy,"

Defendants.

CR No. 2:24-cr-00665-SVW

I N D I C T M E N T

[21 U.S.C. §§ 848(a), (b):  
Engaging in a Continuing Criminal  
Enterprise; 21 U.S.C.  
§§ 841(a)(1), (b)(1)(A)(ii)(II):  
Distribution of Cocaine; 21 U.S.C.  
§§ 841(a)(1), (b)(1)(A)(ii)(II):  
Possession with Intent to  
Distribute Cocaine; 21 U.S.C.  
§§ 853 and 881(a)(6) and 28 U.S.C.  
§ 2461(c): Criminal Forfeiture]

The Grand Jury charges:

COUNT ONE

[21 U.S.C. §§ 848(a), (b)]

[ALL DEFENDANTS]

Beginning on an unknown date, but no later than August 2013, and continuing to on or about October 28, 2024, in Los Angeles County, within the Central District of California, and elsewhere, defendants DAVID RODRIGUEZ, also known as ("aka") "Gotti," aka "Fat Boy," and RAYMOND O'CONNELL, aka "Sal," aka "White Boy," engaged in a continuing criminal enterprise in that defendants RODRIGUEZ and

1 O'CONNELL knowingly and intentionally violated Title 21, United  
2 States Code Section, 841(a)(1) by committing violations, including  
3 but not limited to, the felony violations alleged in Counts Two  
4 through Five of this Indictment, which Counts are re-alleged and  
5 incorporated here by reference, all of which violations were part of  
6 a continuing series of felony violations of subchapters I and II of  
7 Title 21 of the United States Code, undertaken by defendants  
8 RODRIGUEZ and O'CONNELL in concert with at least five other persons  
9 with respect to whom defendants RODRIGUEZ and O'CONNELL occupied a  
10 position of organizer, supervisor, and manager, and from which  
11 continuing series of violation defendants RODRIGUEZ and O'CONNELL  
12 obtained substantial income and resources.

13 Furthermore, defendants RODRIGUEZ and O'CONNELL were principal  
14 administrators, organizers, and leaders of the criminal enterprise,  
15 which involved the possession with intent to distribute and  
16 distribution of at least 150 kilograms of a mixture and substance  
17 containing a detectable amount of cocaine, a Schedule II narcotic  
18 drug controlled substance.

19 CONTINUING SERIES OF VIOLATIONS

20 In addition to Counts Two through Five of this Indictment, the  
21 following series of violations were committed or caused by defendants  
22 RODRIGUEZ and O'CONNELL:

23 1. On or about August 15, 2013, in Los Angeles, California,  
24 the criminal enterprise knowingly and intentionally distributed 21.4  
25 kilograms of a mixture and substance containing a detectable amount  
26 of cocaine, a Schedule II narcotic drug controlled substance, in  
27 violation of Title 21, United States Code, Sections 841(a)(1),  
28 (b)(1)(A)(ii)(II);

1           2.     From December 2021 to May 2024, in the states of New York  
2 and California, the criminal enterprise knowingly and intentionally  
3 distributed approximately 20,941 gross kilograms (inclusive of  
4 packaging material) containing a mixture and substance containing a  
5 detectable amount of cocaine, a Schedule II narcotic drug controlled  
6 substance, in violation of Title 21, United States Code, Sections  
7 841(a)(1), (b)(1)(A)(ii)(II);

8           3.     On or about March 15, 2023, in Townsville, South Carolina,  
9 the criminal enterprise knowingly and intentionally possessed with  
10 intent to distribute 40 kilograms of a mixture and substance  
11 containing a detectable amount of cocaine, a Schedule II narcotic  
12 drug controlled substance, in violation of Title 21, United States  
13 Code, Sections 841(a)(1), (b)(1)(A)(ii)(II);

14           4.     On or about October 11, 2023, in New York City, New York,  
15 the criminal enterprise knowingly and intentionally distributed 29.04  
16 kilograms of a mixture and substance containing a detectable amount  
17 of cocaine, a Schedule II narcotic drug controlled substance, in  
18 violation of Title 21, United States Code, Sections 841(a)(1),  
19 (b)(1)(A)(ii)(II); and

20           5.     On or about November 29, 2023, in New York City, New York,  
21 the criminal enterprise knowingly and intentionally distributed one  
22 kilogram of a mixture and substance containing a detectable amount of  
23 cocaine, a Schedule II narcotic drug controlled substance, in  
24 violation of Title 21, United States Code, Sections 841(a)(1),  
25 (b)(1)(A)(ii)(II).

COUNT TWO

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(ii)(II); 18 U.S.C. §§ 2(a), (b)]

[ALL DEFENDANTS]

On or about March 7, 2024, in Los Angeles County, within the Central District of California, defendants DAVID RODRIGUEZ, also known as ("aka") "Gotti," aka "Fat Boy," and RAYMOND O'CONNELL, aka "Sal," aka "White Boy," aiding and abetting each other, knowingly and intentionally distributed, and willfully caused to be distributed, at least five kilograms, that is, approximately 39 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance.

COUNT THREE

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(ii)(II); 18 U.S.C. §§ 2(a), (b)]

[ALL DEFENDANTS]

On or about August 30, 2024, in Los Angeles County, within the Central District of California, defendants DAVID RODRIGUEZ, also known as ("aka") "Gotti," aka "Fat Boy," and RAYMOND O'CONNELL, aka "Sal," aka "White Boy," aiding and abetting each other, knowingly and intentionally distributed, and willfully caused to be distributed, at least five kilograms, that is, approximately 5,015.2 grams, of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance.

COUNT FOUR

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(ii)(II); 18 U.S.C. §§ 2(a), (b)]

[ALL DEFENDANTS]

On or about September 12, 2024, in Los Angeles County, within the Central District of California, defendants DAVID RODRIGUEZ, also known as ("aka") "Gotti," aka "Fat Boy," and RAYMOND O'CONNELL, aka "Sal," aka "White Boy," aiding and abetting each other, knowingly and intentionally possessed with intent to distribute, and willfully caused to be possessed with intent to distribute, at least five kilograms, that is, approximately 547 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance.

COUNT FIVE

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(ii)(II); 18 U.S.C. §§ 2(a), (b)]

[ALL DEFENDANTS]

On or about October 7, 2024, in Los Angeles County, within the Central District of California, defendants DAVID RODRIGUEZ, also known as ("aka") "Gotti," aka "Fat Boy," and RAYMOND O'CONNELL, aka "Sal," aka "White Boy," aiding and abetting each other, knowingly and intentionally possessed with intent to distribute, and willfully caused to be possessed with intent to distribute, at least five kilograms, that is, approximately 175.8 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance.

FORFEITURE ALLEGATION

[21 U.S.C. § 881(a)(6), 28 U.S.C. § 2461(c)  
and 21 U.S.C. § 853]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given to defendants that the United States will seek forfeiture as part of any sentence in accordance with Title 21, United States Code, Section 881(a)(6), Title 28, United States Code, Section 2461(c) and Title 21, United States Code Section 853, in the event of any defendant's conviction under any of Counts One through Five of this Indictment.

2. Defendants shall forfeit to the United States the following property:

a. all right, title and interest in any and all property, real or personal:

i. constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of any offense set forth in any of Counts One through Five of this Indictment; or

ii. used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of any offense set forth in any of Counts One through Five of this Indictment; and

b. a sum of money equal to the total value of the property described in subparagraph a above.

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), defendants shall forfeit substitute property, up to the value of the property described in the preceding paragraph if, as the result of any act or omission of any defendant, the property described in the preceding paragraph or any portion thereof (a) cannot be located upon

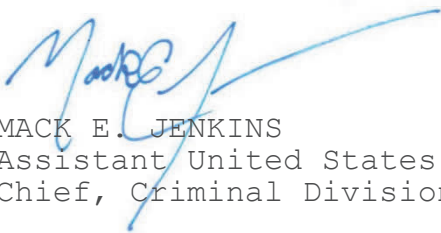


1 the exercise of due diligence; (b) has been transferred, sold to, or  
2 deposited with a third party; (c) has been placed beyond the  
3 jurisdiction of the court; (d) has been substantially diminished in  
4 value; or (e) has been commingled with other property that cannot be  
5 divided without difficulty.

6 A TRUE BILL

7  
8 /s/  
9 Foreperson

10  
11 E. MARTIN ESTRADA  
United States Attorney

12   
13  
14 MACK E. JENKINS  
Assistant United States Attorney  
15 Chief, Criminal Division

16 J. MARK CHILDS  
Assistant United States Attorney  
17 Chief, International Narcotics,  
Money Laundering, and  
18 Racketeering Section

19 BRITTNEY M. HARRIS  
Assistant United States Attorney  
20 Deputy Chief, International  
Narcotics, Money Laundering, and  
21 Racketeering Section

22 JENNA G. WILLIAMS  
Assistant United States Attorney  
23 Corporate and Securities Fraud  
Strike Force Section  
24  
25  
26  
27  
28